

FILED

MAY 13 2015

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

HARRUNAH R. SAMORI,

a/k/a "Nino,"

REGINALD D. JACKSON,

RICHARD L. WELCH,

a/k/a "Shorty," "Uncle,"

TADAR M. BAHAR,

a/k/a "Big Boy,"

CHRISTOPHER LARON COOK,

a/k/a "Chris," "Little Ron,"

"Little Rod,"

Defendants.

4:15CR00229 HEA/NCC

INDICTMENT

COUNT I

The Grand Jury charges that:

Beginning at a time unknown to the Grand Jury, but including March, 2014, and continuing to the date of this indictment, within the Eastern District of Missouri, and elsewhere, the defendants,

HARRUNAH R. SAMORI,

a/k/a "Nino,"

REGINALD D. JACKSON,

RICHARD L. WELCH,

a/k/a "Shorty," "Uncle," and

CHRISTOPHER LARON COOK,

a/k/a "Chris," "Little Ron," "Little Rod,"

knowingly and intentionally combined, conspired, confederated, and agreed together, and with

each other, and with other persons known and unknown to the Grand Jury, to commit the following offense against the United States: to distribute one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846.

COUNT II

The Grand Jury charges that:

Beginning at a time unknown to the Grand Jury, but including January, 2015, and continuing to the date of this indictment, within the Eastern District of Missouri, and elsewhere, the defendants,

**REGINALD D. JACKSON,
TAHAR M. BAHAR,
a/k/a "Big Boy,"**

knowingly and intentionally combined, conspired, confederated, and agreed together, and with each other, and with other persons known and unknown to the Grand Jury, to commit the following offense against the United States: to distribute one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846.

COUNT III

On or about October 30, 2014, in the Eastern District of Missouri, the defendant,

REGINALD D. JACKSON,

did knowingly possess a firearm, that is: S & W Kel Tech .40 caliber rifle, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, conspiracy to possess with the intent to distribute heroin in violation of Title 21, United States Code, Section 841(a) and 846; in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT IV

The Grand Jury further charges that:

Beginning at a time unknown to the Grand Jury, but including July, 2012 and continuing to the date of this indictment, within the Eastern District of Missouri, and elsewhere, the defendant,

REGINALD D. JACKSON,

did knowingly combine, conspire, and agree with persons known and unknown to the Grand Jury to commit offenses against the United States in violation of Title 18, United States Code, Section 1956 and 1957, to wit: (a) to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce; (b) which in fact involved the proceeds of a specified unlawful activity, to wit: conspiracy to distribute a controlled substance in violation of Title 21, United States Code, Sections 841(a)(1) and 846; (c) knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity; and (d) while conducting and attempting to conduct such financial transactions, the defendant knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18,

United States Code, Section 1956(a)(1)(B)(i).

All in violation of Title 18, United States Code, Section 1956(h).

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Sections 841(a)(1) and 846 as set forth in Counts I and II of this indictment, the defendants shall forfeit to the United States of America any property, constituting, or derived from proceeds obtained, directly or indirectly, as a result of the such violation(s), and any property used or intended to be used, in any manner or part to commit or to facilitate the commission of such violation(s).

2. Money Judgment: Subject to forfeiture upon a conviction of Counts I and II is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds obtained directly or indirectly as a result of said violation(s).

3. Pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Section 924 as set forth in Count III, the defendant(s) shall forfeit to the United States of America any firearm or ammunition involved in or used or intended to be used in said violation(s).

4. Pursuant to Title 18, United States Code, Section 982(a), upon conviction of an offense in violation of Title 18, United States Code, Section 1956 as set forth in Count IV, the defendant(s) shall forfeit to the United States of America any property, real or personal, involved in such offense, or any property traceable to such property.

5. Money Judgment: Subject to forfeiture upon a conviction of Count IV is a sum of money equal to the total value of any property, real or personal, involved in such offense, or any property traceable to such offense.

6. Specific property subject to forfeiture includes, but is not limited to, the following:

(a) Real Property: All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements located at: 11983 El Camara Drive, more particularly described as: Lot 102 of Pennyrich Farms Plat 4 according to the plat thereof recorded in Plat Book 174 page 63 of the St. Louis County records. Together with all improvements thereon known as and numbered 11983 El Camara Drive. 08F230496

(b) Automobiles:

(1) 2014 Jeep Cherokee SRT8, VIN: 1C4RJFDJ7EC434738;

(2) 2011 Infiniti, VIN: JN1BY1AR8BM376030;

(3) 2007 Toyota RAV4, VIN: JTMBK32V776019245;

(c) Jewelry:

(1) Ladies 14ky necklace, (78) rb dias; 31" long;

(2) Ladies 14kw stud earrings, (1) rb dia.,

seized on or about October 30, 2014 from Reginald D. Jackson.

(d) Firearms: One S&W Kel Tech .40 caliber rifle, bearing serial number EOH83.

2. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

(a) cannot be located upon the exercise of due diligence;

- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL

FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

JEANNETTE S. GRAVISS #44483MO
Assistant United States Attorney